

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

|                                    |   |                   |
|------------------------------------|---|-------------------|
| -----                              | X |                   |
|                                    | : |                   |
| SCREEN ACTORS GUILD - AMERICAN     | : |                   |
| FEDERATION OF TELEVISION AND RADIO | : |                   |
| ARTISTS, NEW YORK LOCAL            | : |                   |
|                                    | : |                   |
| Plaintiff,                         | : | Civil No. 21/4972 |
|                                    | : |                   |
| -v-                                | : |                   |
|                                    | : |                   |
| NEW YORK PUBLIC RADIO              | : |                   |
|                                    | : |                   |
| Defendant.                         | : |                   |
| -----                              | X |                   |

**EXHIBIT D TO COMPLAINT TO COMPEL ARBITRATION**



March 2, 2021

VIA E-MAIL ([MJefferson@nypublicradio.org](mailto:MJefferson@nypublicradio.org))

Monique Jefferson  
Chief Human Resources Officer  
New York Public Radio  
160 Varick Street, 7th Floor  
New York, NY 10013

**Subject: Grievance regarding termination of Fred Mogul**

Dear Ms. Jefferson,

Pursuant to Article XXI of the 2018-2022 SAG-AFTRA/WNYC collective bargaining agreement ("CBA"), please accept this letter as a written grievance of Fred Mogul's termination and an appeal of the wrongful disciplinary action taken against him. As a remedy, SAG-AFTRA demands that Mr. Mogul be reinstated to his position with backpay and that the wrongful disciplinary action be rescinded from his personnel file. As we have expressed on several occasions, we are deeply troubled by the manner in which this circumstance has been conducted and feel it is offensive to notions of transparency and fairness, values we expect WNYC to uphold.

Please advise of your availability for a grievance meeting

Sincerely,

A handwritten signature in black ink, appearing to read "JM" or "Joshua Mendelsohn".

**Joshua Mendelsohn**

**Senior Labor Counsel, News and Broadcast**

CC: Richard Larkin ([Richard.Larkin@sagaftra.org](mailto:Richard.Larkin@sagaftra.org))

Janna Freed ([jfreed@nypublicradio.org](mailto:jfreed@nypublicradio.org))

Edward Lieber ([Lieber@kmm.com](mailto:Lieber@kmm.com))

Joshua Mendelsohn, Senior Labor Counsel, News and Broadcast  
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Associated Actors & Artistes of America / AFL-CIO